

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

JOHN J. VAUGHN, GERALD A.
KALBFLEISCH, MICHAEL HATHAWAY, and
MYRTLE HATHAWAY,

Plaintiffs,

v.

PUTNAM INVESTMENT MANAGEMENT,
LLC and PUTNAM RETAIL MANAGEMENT
LIMITED PARTNERSHIP,

Defendants.

Civil Action No. 04-10988 (GAO)

**PLAINTIFFS' ASSENTED-TO MOTION TO IMPOUND IN CONNECTION WITH
PLAINTIFFS' FORTHCOMING MOTION TO ENLARGE DEPOSITION LIMIT**

In connection with Plaintiffs' forthcoming motion to enlarge the deposition limit, Plaintiffs respectfully request, pursuant to Local Rule 7.2, that the Court allow Plaintiffs to file under seal Plaintiffs' Memorandum in Support of Motion to Enlarge the Deposition Limit. As grounds for this assented-to motion, Plaintiffs state as follows:

1. Plaintiffs plan to file this week a motion to enlarge the deposition limit.
2. In order to explain to the Court why additional depositions are warranted, Plaintiffs need to disclose information that Putnam has designated as being "Confidential" or "Highly Confidential" under the parties' Stipulation and Order For The Protection and Exchange of Confidential and Highly Confidential Information (the "Stipulation and Order") (Docket No. 43).
3. This motion is supported by the Stipulation and Order, which provides for the filing under seal of materials designated by the parties' as Confidential or Highly Confidential.

4. Local Rule 7.2(a) requires that a motion to impound “contain a statement of the earliest date on which the impounding order may be lifted, or a statement, supported by good cause, that the materials should be impounded until further order of the court. The motion shall contain suggested custody arrangements for the post-impoundment period.”

5. Plaintiffs suggest that at the conclusion of the litigation, after any appeals have been exhausted, Plaintiffs’ Memorandum in Support of Motion to Enlarge the Deposition Limit be returned to Plaintiffs’ counsel of record for handling in accordance with the terms of the Stipulation and Order.

WHEREFORE, Plaintiffs respectfully request that the Court allow Plaintiffs’ Assented-To Motion to Impound In Connection With Plaintiffs’ Forthcoming Motion to Enlarge the Deposition Limit.

Respectfully submitted,

/s/ Lisa A. Furnald

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Dated: January 8, 2007

LOCAL RULE 7.1(A) (2) CERTIFICATION

I, Lisa Furnald, hereby certify that I conferred with counsel for Defendants Putnam Investment Management, LLC and Putnam Management Limited Partnership on January 8, 2007, and they assent to the relief requested by this motion.

/s/ Lisa A. Furnald

CERTIFICATE OF SERVICE

I, Lisa A. Furnald, hereby certify that on January 8, 2007, this document was served electronically through the ECF System and by first class mail, postage prepaid, to those counsel of record indicated as non-registered ECF participants.

/s/ Lisa A. Furnald